



April 14, 2014

Mr. Scott McMillan
Hunting Point Apartments LLC
7900 East Union Avenue, #500
Denver, CO 80237

And

Mr. Richard Ponak
Pesticides/Asbestos Programs and Enforcement Branch
U.S. EPA, Region III
1650 Arch Street
Mailcode (3LC62)
Philadelphia, PA 19103

**Re: Asbestos Abatement Management and Response to Administrative
Compliance Order and Required Submission of Information and Sampling
from United States Environmental Protection Agency
Hunting Point on the Potomac
1202 and 1204 South Washington Street
Alexandria, Virginia 22314
AEC Project No. 14-070**

Dear Messrs. McMillan and Ponak:

Advantage Environmental Consultants, LLC (AEC) has completed asbestos-containing materials (ACMs) sampling services for the Hunting Point on the Potomac Apartments, located in Alexandria, Virginia (the Site). The asbestos abatement services were completed according to the scope of work outlined in the Environmental Protection Agency (EPA) Section 114 Letter, dated April 2, 2014 regarding Hunting Point on the Potomac (aka Hunting Point Apartments) at 1202 and 1204 South Washington Street in Alexandria, Virginia.

Background

On April 2, 2014 EPA ordered Hunting Point Apartments, LLC and its contractor to halt renovation work at the Site because of failure to follow standard asbestos removal and disposal procedures. The order required the owner and its contractor to take necessary actions to prevent potential exposure to asbestos fibers and to ensure that additional work at the Site is performed in accordance with applicable local, state, and federal regulations.

The order determined that the owner and its contractor failed to provide adequate notice to the Virginia Department of Labor and Industry of demolition/renovation projects involving friable asbestos; failure to adequately wet all regulated ACM removed or stripped from the Site and to ensure that all ACMs remained adequately wet until collected and contained in preparation for proper disposal; and, failure to dispose of ACM containing waste as soon as practical.

The EPA also required that the owner sample select apartment units and common areas where ACM has been removed. The order prohibited further work until the EPA can confirm that the owner and its contractor are in compliance with the order, Clean Air Act regulations for asbestos, and the National Emissions Standards for Hazardous Air Pollutants (NESHAP).

Sampling Procedures

Apartment Units

AEC conducted a visual inspection and determined that the largest number of aggressive activities occurred with the largest volume of ACM in Units [REDACTED] and [REDACTED] of Building 1204 and Units [REDACTED] of Building 1202. EPA Inspector Mr. Richard Ponak confirmed the suitability of the sample locations selected and observed portions of the sample collection activities. The following sampling activities were performed in these units:

- a. Five microvac dust samples were collected for asbestos analysis using ASTM International (ASTM) Method D5755-09.
- b. Two stationary air samples were collected in each room where ACM removal took place and analyzed by transmission electron microscopy (TEM) National Institute for Occupational Safety and Health (NIOSH) Method 7402. In addition, at least 20% of the samples were analyzed by the International Organization for Standardization (ISO) 10312 Method. Samples were collected over approximately an eight-hour period and the air was agitated before and during sampling (e.g., initial sweeping or vacuuming). This agitation was conducted approximately every two hours during sampling.
- c. Two activity-based air samples (ABS) for asbestos was performed in the entire apartment unit to replicate common household activities for an approximate three-hour period (e.g., vacuuming, dusting, walking, shuffling papers). Analyze using TEM NIOSH Method 7402 with at least 20% of the samples analyzed by ISO 10312.

Common Areas

AEC identified common areas (e.g., hallways, meeting room, lobby, laundry room) in Buildings 1202 and 1204 where it was determined that the largest

number of aggressive activities had occurred and/or the most recent ACM removal had occurred. These areas included the ground floor hallway and laundry room in Building 1204 and the eighth floor hallway in Building 1202. Mr. Ponak confirmed the suitability of the sample locations selected and observed portions of the sample collection activities. The rationale for the selection of these areas is included in the Sampling Summary included as Attachment A. The following sampling activities were performed in these common areas:

- a. Five microvac dust samples were collected in each identified common area for asbestos using ASTM Method D5755-09. Samples were collected in areas that were heavily dust laden based on visual inspection and were collected in rooms where ACM removal occurred.
- b. Two stationary air samples were collected in each area where ACM removal took place and analyzed by TEM NIOSH Method 7402. At least 20% of the samples were analyzed by the ISO 10312 Method. Samples were collected over an eight-hour period and the air agitated before and during sampling (e.g., initial sweeping or vacuuming). This agitation was conducted approximately every two hours during sampling.
- c. Two ABS were collected in each common area to replicate common activities that occur there for an approximately three-hour period (e.g., vacuuming, dusting, walking, shuffling papers). ABS samples were analyzed using TEM NIOSH Method 7402 with at least 20% of the samples analyzed by ISO 10312 Method.

Some samples required re-testing due to excessive sample media loading with particulates. Re-testing included reduced agitation and reduced air volume to avoid overloading the sample media. Overloaded samples and re-tests are identified in Attachment A.

In addition, one ABS sample from the 8th Floor Hallway of Building 1202 had a blown filter. A new ABS sample was collected from this area with no incidents.

The results of the sampling activities, including specific sampling locations, are provided in Attachment A. All samples were submitted to AMA Analytical Services, Inc. (AMA) in Lanham, Maryland for analysis. AMA is an accredited National Voluntary Laboratory Accreditation Program (NVLAP) asbestos TEM laboratory.

In accordance with the Administrative Order, AEC submitted laboratory results to the EPA upon receipt. Each submittal included descriptive figures, photographs and a detailed description of each sampling activity. Copies of each submittal are included in Attachment B.

A copy AMA's Quality Control/Quality Assurance Report will be submitted separately as soon as available.

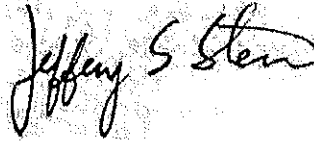
We appreciate the opportunity to be of service to Hunting Point Apartments LLC. If you should have any questions regarding this project, or if we can be of further assistance, please contact the undersigned at (301) 776-0500.

Sincerely,

ADVANTAGE ENVIRONMENTAL CONSULTANTS, LLC



Andrew Owens, P.G.
Senior Project Manager



Jeff Stein, P.G.
Principal

Attachments